

October 27, 2017



**BY ELECTRONIC SUBMISSION TO:**

The Supreme Court of Arizona  
Attn: Michelle Martinez  
Certification and Licensing Division

**Re: Comment on Proposed Changes to ACJA § 7-208**

To Whom It May Concern,

This office represents the Arizona Association of Independent Paralegals ("AAIP"). Attached hereto is the objection to and comment on the proposed amendments to ACJA § 7-208(J)(3).

While AAIP has focused its comment on Subsection J, that is not to imply that AAIP does not also oppose other aspects of the proposed amendments. For example, AAIP opposes the proposed ACJA § 7-208(L)(3)(b), which would require all newly-certified CLDPs to attend a mandatory “two-hour professionalism training course of the role and responsibilities of the certified legal document preparer.” This amendment is redundant, as ACJA § 7-208(L)(4)(a)(2) already requires every CLDP to complete at least two (2) hours of ethics every other year.

Indeed, the proposed amendments contained in ACJA § 7208(J)(3) pose a dire threat to the CLDP profession. As explained in the comment, should the amendments be allowed to pass, the Arizona Supreme Court will not only walk back the strides made toward access to civil justice, but it will introduce a serious constitutional issue that AAIP will not hesitate to pursue if necessary.

That said, we appreciate the opportunity to explain and discuss these issues with the Court and Board in the coming weeks and months. Thank you for your attention and consideration.

Sincerely,

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